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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91215169
Party	Defendant Denali Co., LLC
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Submission	Request for Discovery Conference
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Date	04/28/2014
Attachments	G0854141.PDF(19793 bytes)

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

In the matter of Application Ser. No.: 85/864,403

Filed: February 27, 2014

For the mark: CAMEL CARIBOU & Design

Published in the Official Gazette (Trademarks) on September 3, 2013

**ARABICA FUNDING, INC. and
CARIBOU COFFEE COMPANY, INC.**
Opposers

v.

DENALI CO., LLC
Applicant

Opposition No. 91215167

In the matter of Application Ser. No.: 85/878,883

Filed: February 27, 2014

For the mark: CHOCOLATE CAMEL CARIBOU & Design

Published in the Official Gazette (Trademarks) on September 3, 2013

**ARABICA FUNDING, INC. and
CARIBOU COFFEE COMPANY, INC.**
Opposers

v.

DENALI CO., LLC
Applicant

Opposition No. 91215169

**MOTION FOR CONSOLIDATION & APPLICANT'S REQUEST FOR BOARD
PARTICIPATION IN THE DISCOVERY CONFERENCE**

Applicant Denali Co. LLC, by and through its undersigned counsel, hereby requests that the Board consolidate this opposition (Opposition No. 91215167) with an additional opposition

also filed by Opposer against the Applicant (Opposition No. 91215169). Each opposition was filed on February 27, 2014, however the proceedings were assigned to separate interlocutory attorneys. Counsel for Applicant left a voicemail this afternoon to seek Opposer's consent to the relief requested in this motion, but the call was not returned as of the filing of this motion. If Opposer indicates its consent to this motion, the parties will update the Board accordingly.

Applicant believes that good cause exists for the consolidation because of the similarity of the marks at issue in each opposition, the goods at issue are the same for both marks, and that having different interlocutory attorneys will be less efficient for the Board. Specifically, Opposition No. 91215167 is related to the mark CAMEL CARIBOU & Design and Opposition No. 91215169 is related to the mark CHOCOLATE CAMEL CARIBOU & Design. Both marks are for use in association with "Milk" in International Class 29.

Pursuant to Trademark Rule 2.120(a)(2), Applicant also requests participation of the Board in the parties' discovery conference. The parties have not yet discussed a proposed date and time for the conference. Applicant expects that the parties will update the Board with a proposed date and time for the discovery conference as soon as possible when the parties' counsel have conferred about their schedules.

Respectfully submitted,

Dated: April 28, 2014

By: /s/ G. Thomas Williams
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CERTIFICATE OF SERVICE

This is to certify that a true and complete copy of the foregoing *Motion For Consolidation & Applicant's Request For Board Participation In The Discovery Conference* was served by electronic on Applicant's counsel at the following address on April 28, 2014, with a confirmation copy via first-class US mail:

Elizabeth C. Buckingham
Heather D. Redmond
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Dated: April 28, 2014

By: /s/ G. Thomas Williams

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